IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE In re: \* Chapter 11 W. R. GRACE & CO., et al., \* Case No. 01-01139(JKF) Debtors. \* (Jointly Administered) Deposition of MORTON CORN, Ph.D., B.Ch.E., CSP Linthicum, Maryland Thursday, May 29, 2003 9:08 a.m. Job No.: 1-17366 Pages: 1 - 203 Reported by: Marianne R. Hewitt

ıge 84	3	Page 86	T	Page 88
ne	1 2	bulk for said content, that's the information you	1	clearly a situation where workers were exposed at
	2	need.	2	levels where there's a significant amount of disease, I
	3	You're inferring from the high value that	3	wasn't sure what I could contribute as an expert.
	4	there's something wrong from the bulk or something	4	Q. All right. But how about as to the homes and
id	5	wrong with the air, and that's the only data if you	5	the cleanup? We're not talking about the personal
d	6	want to rebut it that can certainly rebut it.	6	injury cases, we're talking about the homes and the
	7	Q. You know we have mesotheliomas in Libby,	7	cleanup.
	8	correct?	8	A. Then it got to the homes and the cleanup
	9	A. Yes, I do know that.	9	Q. Right.
,	10	Q. Do you know that there's mesotheliomas in not	10	A and they never came back to me. And I
	11	only the miners but family members?	11	never aggressively said hey, I told you I wouldn't get
lack	12	A. I'm not familiar with all of the data, I just	12	involved in the facility, but I'd like to get involved
. Iack	13	knew there were mesotheliomas.	13	in the cleanup.
ľ	14	Q. Okay. And you don't know and you haven't	14	Q. Okay.
I'm	15	looked into whether those mesotheliomas are	15	A. So I was never associated with any of that
l l	16	attributable to tremolite fibers or tremolite cleavage	16	effort.
ey	17	fragments if they're there, you just don't know that.	17	Q. Okay.
	18	A. I don't know that.	18	A. And then I was asked to look at the attic
rials.	19	Q. Okay. Dr. Corn, were you asked to get	19	insulation and that struck me as a very interesting
.1415.	20	involved in the Libby matter by Grace?	20	involvement, particularly on the heels of the
	21	A. I wasn't asked.	21	buildings, and I said I'd be happy to be involved.
stos	22	Q. Did you have conversations with someone about	22	Q. Okay. Did part of your involvement for Grace
h	23	getting involved in it?	23	involve going down to meet with EPA officials in
dn't	24	A. I indicated I didn't want to be involved in	24	Washington?
3111	25	it.	25	A. Yes, I went to Washington and met with senior
	<u> </u>			120 100, 1 work to Washington and met with semon
ige 85	{	Page 87		
	7	i age o/	1	Page 89
_	] ]	•	1	Page 89
еп	1 2	Q. Okay. And the reason you didn't want to be involved in it was what?	1 2	management of the agency, the kind of second tier
en ulk	1 2 3	Q. Okay. And the reason you didn't want to be involved in it was what?	1 2 3	management of the agency, the kind of second tier management.
en ulk ut	i I	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed	3	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?
en ulk ut as	3	Q. Okay. And the reason you didn't want to be involved in it was what?	3 4	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of
en ulk uut as	3 4	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.	3 4 5	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was
en ulk ut as	3 4 5	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about	3 4 5 6	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.
en ulk ut as	3 4 5 6	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working	3 4 5 6 7	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.
en ulk uut as	3 4 5 6 7	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they	3 4 5 6 7 8	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of
en ulk uut as	3 4 5 6 7 8	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.	3 4 5 6 7 8	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.
en ulk ut as	3 4 5 6 7 8 9	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and	3 4 5 6 7 8 9	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with
en ulk ut as	3 4 5 6 7 8 9	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that	3 4 5 6 7 8 9 10	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?
en ulk uut as	3 4 5 6 7 8 9 10	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and	3 4 5 6 7 8 9 10 11	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I
en ulk uut as	3 4 5 6 7 8 9 10 11 12	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.	3 4 5 6 7 8 9 10 11 12	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but
en ulk uut as	3 4 5 6 7 8 9 10 11 12 13	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather	3 4 5 6 7 8 9 10 11 12 13 14	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the
en ulk uut as	3 4 5 6 7 8 9 10 11 12 13 14	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather not be involved in the super fund action out there	3 4 5 6 7 8 9 10 11 12 13 14 15	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the Washington office.
en ulk uut as	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather	3 4 5 6 7 8 9 10 11 12 13 14 15 16	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the Washington office.  And there was a senior person from the Region
en ulk ut as r olite	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather not be involved in the super fund action out there which involved the government's attempt to recover from Grace the cost of cleanup?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the Washington office.  And there was a senior person from the Region VIII office.
en ulk ut as	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather not be involved in the super fund action out there which involved the government's attempt to recover from Grace the cost of cleanup?  A. I said anything involved with the facility	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the Washington office.  And there was a senior person from the Region VIII office.  And then there was a very large number of
en ulk ut as r olite	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather not be involved in the super fund action out there which involved the government's attempt to recover from Grace the cost of cleanup?  A. I said anything involved with the facility and with the working population associated with the	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the Washington office.  And there was a senior person from the Region VIII office.  And then there was a very large number of other EPA employees, probably as many as a dozen, I
en ulk ut as r olite	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather not be involved in the super fund action out there which involved the government's attempt to recover from Grace the cost of cleanup?  A. I said anything involved with the facility	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the Washington office.  And there was a senior person from the Region VIII office.  And then there was a very large number of other EPA employees, probably as many as a dozen, I don't remember.
en ulk ut as r olite	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 1 22 22	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather not be involved in the super fund action out there which involved the government's attempt to recover from Grace the cost of cleanup?  A. I said anything involved with the facility and with the working population associated with the facility was my— that was discussions early on. I guess I—	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the Washington office.  And there was a senior person from the Region VIII office.  And then there was a very large number of other EPA employees, probably as many as a dozen, I don't remember.  And there were people there from the
en ulk ut as r olite	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 12 22 23	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather not be involved in the super fund action out there which involved the government's attempt to recover from Grace the cost of cleanup?  A. I said anything involved with the facility and with the working population associated with the facility was my—that was discussions early on. I guess I—  Q. Is it for some personal reason you just don't	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the Washington office.  And there was a senior person from the Region VIII office.  And then there was a very large number of other EPA employees, probably as many as a dozen, I don't remember.  And there were people there from the solicitor's office.
en ulk out as r olite	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather not be involved in the super fund action out there which involved the government's attempt to recover from Grace the cost of cleanup?  A. I said anything involved with the facility and with the working population associated with the facility was my— that was discussions early on. I guess I—	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the Washington office.  And there was a senior person from the Region VIII office.  And then there was a very large number of other EPA employees, probably as many as a dozen, I don't remember.  And there were people there from the solicitor's office.  Q. Okay. And was the meeting in connection with
en ulk ut as r olite	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 12 22 23	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather not be involved in the super fund action out there which involved the government's attempt to recover from Grace the cost of cleanup?  A. I said anything involved with the facility and with the working population associated with the facility was my that was discussions early on. I guess I  Q. Is it for some personal reason you just don't feel right about trying to defend that type of	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the Washington office.  And there was a senior person from the Region VIII office.  And then there was a very large number of other EPA employees, probably as many as a dozen, I don't remember.  And there were people there from the solicitor's office.  Q. Okay. And was the meeting in connection with the ZAI issue?
en ulk out as r olite	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Okay. And the reason you didn't want to be involved in it was what?  A. Everything I had read, workers were exposed at very high values and there was extensive disease, and in my mind that was a closed issue.  I was told that Grace acknowledges that about the situation in the past amongst the working population was such that disease could develop and they took responsibility for that disease.  That was before the issues of the homes and the contamination of Libby arose, but it was at that early stage that I indicated I would rather not be involved.  Q. All right. Did you indicate you would rather not be involved in the super fund action out there which involved the government's attempt to recover from Grace the cost of cleanup?  A. I said anything involved with the facility and with the working population associated with the facility was my— that was discussions early on. I guess I—  Q. Is it for some personal reason you just don't feel right about trying to defend that type of activity?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	management of the agency, the kind of second tier management.  Q. Okay. Who went with you?  A. R. J. Lee, Mr. Finke, a vice president of Grace, and I believe Gary Marsh. I think he was president for the University of Pittsburgh.  Q. Okay.  A. And I believe that was it, I can't think of any others at this point.  Q. Okay. And do you remember who you met with at EPA?  A. There was a deputy assistant director. I didn't make notes of who was there and the titles, but I believe it was a deputy assistant director from the Washington office.  And there was a senior person from the Region VIII office.  And then there was a very large number of other EPA employees, probably as many as a dozen, I don't remember.  And there were people there from the solicitor's office.  Q. Okay. And was the meeting in connection with